



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF MATERIALS MANAGEMENT & COMPLIANCE ASSURANCE
WATER PERMITTING AND ENFORCEMENT DIVISION
(860) 424-3018

Issuance of the General Permit for the Discharge of Stormwater Associated with Commercial Activity (without modifications)

The Department of Environmental Protection's General Permit for the Discharge of Stormwater Associated with Commercial Activity is hereby issued with the effective date noted below. The General Permit for the Discharge of Stormwater Associated with Commercial Activity will expire on April 30, 2014, unless otherwise modified in accordance with law.

Issued Date: May 1, 2009

GINA McCARTHY

Commissioner

This is a true and accurate copy of the general permit executed on May 1, 2009 by the Commissioner of the Department of Environmental Protection.



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WATER MANAGEMENT
PERMITTING, ENFORCEMENT AND REMEDIATION DIVISION
860-424-3018

General Permit For The Discharge of Stormwater Associated With Commercial Activity

Issuance Date: August 1, 1995

Reissued: September 27, 2000

Printed on recycled paper

Fee Increase Effective August 21, 2003

Effective August 21, 2003, in accordance with Public Act 03-06, Special Session, the fee associated with this general permit has increased. Please note that the fee listed in the general permit itself does not reflect this increase. The correct fees are listed in the Registration form and *Permit Application Transmittal Form*.

The general permit remains in effect for a period of time and the fee will be corrected in the general permit when it is reissued.

The appropriate fee must be submitted with the registration form. A registration shall not be deemed complete and no activity shall be authorized by this general permit unless the registration fee has been paid in full.

General Permit For The Discharge of Stormwater Associated With Commercial Activity

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General Permit For The Discharge of Stormwater Associated With Commercial Activity

Part I. Authority

This general permit is issued under the authority of Section 22a-430b of the Connecticut General Statutes, as amended by Public Act 91-263.

Part II. Definitions

The definitions of terms used in this general permit shall be the same as the definitions contained in Section 22a-423 of the Connecticut General Statutes and Section 22a-430-3(a) of the Regulations of Connecticut State Agencies. The definition of the term "coastal area" shall be the same as the definition contained in Section 22a-94. The definition of the term "high tide line" shall be the same as that contained in Section 22a-359 of the Connecticut General Statutes. The definition of the term "coastal tidal waters" shall be the same as the definition contained in Section 22a-29 of the Connecticut General Statutes. In addition, the following definitions shall apply:

"Commercial activity" means: Any activity or facility under Standard Industrial Classifications (SIC) (as defined in "Standard Industrial Classification Manual, Executive Office of the President, Office of Management and Budget 1987") 50-59 and 70-79, with five (5) acres or more of contiguous impervious surface. Impervious surface means roof area, paved walk, paved parking area, paved driveway, paved roadway and any other paved surface. An activity or facility with an SIC code already covered by the General Permit for the Discharge of Stormwater Associated with Industrial Activity is not included in this definition. See Appendix A for SIC code descriptions.

"Fresh-tidal wetland" means a tidal wetland with an average salinity of less than 0.5 parts per thousand.

"Inland wetland" means a wetland as that term is defined in Section 22a-38 of the Connecticut General Statutes.

"Municipal separate storm sewer" means conveyances for stormwater (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels or storm drains) owned or operated by any municipality and discharging directly to surface waters of the state.

"Permittee" means any person who or municipality which initiates, creates, originates or maintains a discharge to the waters of the state, which discharge is covered under this general permit in accordance with Part III of this general permit.

"Point Source" means any discernible, confined and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged.

"Registrant" means a person who or municipality that submits a complete registration in accordance with Part IV of this general permit.

"Site" means on the same or geographically contiguous property that may be divided by public or private right(s)-of-way.

"Stormwater" means waters consisting of precipitation runoff.

"Stormwater discharge associated with commercial activity" means the stormwater discharge from a point source, which discharge is directly related to the commercial activity, access thereto or parking therefor, including but not limited to stormwater discharged from: ground surfaces within or immediately adjacent to said activity and its access and parking areas; material handling areas; refuse storage or disposal areas; areas used for the storage and maintenance of material handling equipment; shipping and receiving areas; manufacturing buildings; storage areas for raw materials, intermediate products and finished products; and areas where industrial or commercial activity has taken place in the past and where materials remain and are exposed to stormwater.

"Tidal wetland" means a wetland as that term is defined in Section 22a-29 of the Connecticut General Statutes.

Part III. Authorization Under This General Permit

A. Requirements For Authorization

This general permit authorizes only discharges comprised solely of stormwater associated with commercial activity, provided that the following conditions are met prior to coverage under this general permit:

1. The discharge is not covered by a permit issued under Section 22a-430 or 22a-430b of the Connecticut General Statutes;
2. The stormwater is not discharged to a Publicly Owned Treatment Works (POTW) unless such discharge consists only of runoff from areas associated with gardening or nursery materials and such discharge has been approved by the POTW. Portions of the site associated with commercial activity discharging to surface waters or a municipal separate storm sewer are still covered by this general permit.
3. The stormwater is not discharged to ground water. Portions of the site associated with commercial activity discharging to surface waters or a municipal separate storm sewer are still covered by this general permit.

B. Geographic Area

This general permit covers all areas of the State of Connecticut.

C. *Effective Date And Expiration Date*

This general permit is effective on September 27, 2000 and expires on August 1, 2005.

D. *Effective Date of Authorization*

The effective date of coverage under this general permit is the effective date of this general permit listed in Part III Paragraph C above, or the date the commercial activity is initiated, whichever is later.

E. *Issuance of an Individual Permit*

Under Section 22a-430b of the General Statutes, when an individual permit is issued to a person or municipality for stormwater discharges at the site otherwise covered by this permit, the applicability of this general permit to the individual permittee is automatically terminated on the effective date of the individual permit.

Part IV. *Registration Requirements*

A. *Who Must Submit a Registration*

Any person who or municipality which initiates, creates, originates or maintains a discharge described in Part III Paragraph A of this general permit shall submit to the Commissioner a registration which satisfies the requirements of this part either (1) within 180 days after the date of issuance of this permit for any discharge initiated, created, originated or maintained on or before the date of issuance of this permit, or (2) for any other discharge, no later than the date the commercial activity is initiated. If an individual facility or activity for which a registration is submitted under this permit is owned by one person or municipality but is leased or, in some other way, the legal responsibility of another person or municipality (the operator), the operator is responsible for submitting the registration required by this general permit. If the facility or activity for which a registration is submitted under this permit is owned by one person or municipality but is leased or, in some other way, the legal responsibility of more than one other person or municipality, the owner is responsible for submitting the registration required by this general permit. The permittee is responsible for compliance with all conditions of this general permit.

B. *Scope of Registration*

A registrant may only include on a registration those discharges that are operated by such registrant on one site. A registrant may not submit more than one registration per site under this permit.

C. *Contents of Registration*

1. *Fees*

- a. A fee of \$250.00 for any facility shall be paid with the registration required by Part IV.A. of this general permit. On and after September 27, 2000, registration fees shall be paid in accordance with applicable regulations, including but not limited to Sections 22a-430-6 and 22a-430-7 of the

Regulations of Connecticut State Agencies. A registration shall not be deemed complete and no activity shall be authorized by this general permit unless the registration fee has been paid in full.

- b. The registration fee shall be paid by check or money order payable to the Department of Environmental Protection.
- c. The registration fee is nonrefundable.

2. Registration Form

The registration shall be submitted on forms prescribed by the Commissioner and shall include but need not be limited to the following information:

a. Facility Information

- i. Name, address of owner and operator of the commercial facility;
- ii. Site address if different from i. above;
- iii. Site contact person and phone number at the site;
- iv. Primary activity; up to four four-digit Standard Industrial Classification (SIC) codes;
- v. A list of other permits issued by the DEP currently in force for the site, including discharges other than stormwater to the stormwater outlets;
- vi. An 8-1/2 x 11" copy of the applicable section of a United States Geological Survey Quadrangle Map or other location map showing the location of site boundaries, stormwater conveyances, outfalls or channelized flows and latitude and longitude, if known.

b. Stormwater Discharge Information

- i. Number, type (e.g. swale or pipe), material (e.g. concrete or metal pipe, grass swale) and size of conveyances, outfalls or channelized flows that conduct runoff from the site;
- ii. Location of the conveyances, outfalls, channelized stormwater flows discharging from the site shall be shown on the map required in paragraph C.2.a.vi. above;
- iii. If stormwater quality data associated with the site has been collected, a summary of such data;

iv. The name of the immediate receiving water(s), or if the discharge is through a municipal separate storm sewer, the name of the operator of the storm sewer, and the ultimate receiving water(s);

v. The name of the watershed in which the site is located or the nearest waterbody to which it discharges.

c. **Signature of Registrant**

Any person who or municipality that submits a registration under this general permit shall sign the registration and shall make the following certification:

"I certify under penalty of law that I have read and understand all conditions of the General Permit for the Discharge of Stormwater Associated with Commercial Activity issued on September 27, 2000, and that all conditions for eligibility for authorization under this general permit are met. This document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that the information submitted has been properly gathered and evaluated. The Stormwater Management Plan has been prepared and implemented in accordance with the requirements of this general permit. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained in this registration is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are penalties for submitting false information, including the possibility of fine and imprisonment for knowingly making false statements."

The registration shall be signed as follows: for a corporation, by a responsible corporate officer or a duly authorized representative thereof, as those terms are defined in RCSA 22a-430-3(b)(2); for a municipality, state, Federal, or other public agency, by either a principal executive officer or a ranking elected official, as those terms are defined in RCSA 22a-430-3(b)(2); for a partnership or a sole proprietorship, by a general partner or the proprietor, respectively.

d. **Any additional information requested by the Commissioner**

D. Where to Submit a Registration

Persons who or municipalities that submit a registration under this general permit shall submit such registration to the Department of Environmental Protection at the following address:

CENTRAL PERMIT PROCESSING UNIT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
79 ELM STREET
HARTFORD, CT 06106-5127

E. Correction of Inaccuracies

Within fifteen days after the date the registrant or permittee becomes aware of a change in any information submitted to the Commissioner in a registration or pursuant to this general permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the registrant or permittee shall submit the correct or omitted information in writing to the Commissioner.

F. False Statements

Any false statement in any information submitted pursuant to this general permit may be punishable as a criminal offense under Section 22a-438 of the General Statutes or, in accordance with Section 22a-6, under Section 53a-157 of the General Statutes.

G. Additional Information

The Commissioner may require a registrant to submit additional information that the Commissioner deems necessary to evaluate the consistency of the commercial activity with the requirements for authorization under this general permit.

H. Disapproval And Rejection of a Registration

The Commissioner may disapprove a registration (a) for the same reasons for which he may, under Section 22a-430 of the General Statutes, require an individual permit, including without limitation, if he finds that the commercial activity is inconsistent with the requirements for authorization under this general permit, (b) if he finds that the commercial activity is inconsistent with any of the applicable standards and criteria of Section 22a-430 of the General Statutes, or (c) for any other reason provided by law.

I. Transfer of Authorization

Authorization under this general permit shall be non-transferable. However, any person registering a discharge that has previously been registered under this permit may use as part of such registration any pertinent information including the Stormwater Management Plan prepared by the previous permittee. The new registrant shall amend the Plan as required by Part V. B. 3. prior to submitting a registration.

Part V. Permit Conditions For Stormwater Activities Associated With Commercial Activities

A. Conditions Applicable to Certain Discharges

1. Any person who or municipality which initiates, creates, or originates a discharge of stormwater associated with commercial activity after the date of issuance of this general permit, which discharge is located less than 100 feet from a tidal wetland which is not a fresh-tidal wetland, shall discharge such stormwater through a system designed to store the volume of stormwater runoff generated by 1 inch of rainfall on the site.

2. Any person who or municipality which discharges stormwater into coastal tidal waters for which a permit is required under either the Structures and Dredging Act in accordance with Section 22a-361 of the Connecticut General Statutes or the Tidal Wetlands Act in accordance with Section 22a-32 of the Connecticut General Statutes, shall obtain such permit(s) from the Commissioner.

B. Stormwater Management Plan

The permittee shall prepare, implement and maintain a Stormwater Management Plan (the "Plan") which shall consist of all records, schedules, narrative, instructions or other materials kept on file at the registrant's facility in accordance with the Stormwater Management Measures and other provisions of Part V of this general permit.

1. Deadlines for Plan Preparation and Implementation

- a. For a stormwater discharge associated with commercial activity that is initiated, created, originated or maintained on or before the date of issuance of this general permit, the permittee shall prepare and implement the Stormwater Management Measures as defined below in Part V.B.2. on or before 180 days after the date of issuance of this general permit and shall maintain this Plan thereafter.
- b. For stormwater discharges associated with commercial activity which activity is initiated after the date of issuance of this general permit, the Stormwater Management Measures as defined below in Part V.B.2. shall be implemented on or before the date such activity is initiated and shall be maintained thereafter.

2. Stormwater Management Measures

The Stormwater Management Plan shall be maintained on a form prescribed and provided by the Commissioner and shall, at a minimum, contain the following:

a. Pollution Prevention Team

The permittee shall designate a pollution prevention team consisting of personnel, at least one of who must be working at the site, to carry out the provisions of these Stormwater Management Measures.

b. Sweeping

All parking areas, sidewalks, driveways and other impervious surfaces (except roofs) shall be swept clean of sand, litter and any other possible pollutants at least twice a year, once between November 15 and December 15 (after leaf fall) and once during the month of April (after snow melt) and at other times as may be necessary.

c. Outside Storage

Any raw materials, intermediate products, by-products, final products, waste materials, accessories or equipment stored outside shall be covered or moved inside, if possible, or maintained in such a manner as to avoid, if at all possible, the risk of any of these materials or their residue passing to a stormwater discharge.

d. Washing

No water resulting from washing of any raw materials, intermediate products, by-products, final products, waste materials, accessories, equipment, storage areas, outside sales/garden areas, loading docks, parking areas or vehicles shall be discharged to a stormwater collection system or waters of the state (including, but not limited to, surface waters or wetlands) except in accordance with a permit issued by the DEP pursuant to Section 22a-430 or 22a-430b of the Connecticut General Statutes.

e. Spill Control

The permittee shall prepare and implement a Spill Control and Response Plan ("Spill Plan") for any raw materials, intermediate products, by-products, final products, waste materials, accessories or equipment present at the facility which could possibly discharge to the stormwater collection system or waters of the state. The Spill Plan shall include measures to avoid spills in areas exposed to rainfall or from reaching areas exposed to rainfall. The Spill Plan shall also include response measures to best prevent a spill from being exposed to stormwater or entering a stormwater collection system or waters of the state once it has occurred.

- The Spill Plan shall identify areas where potential spills can occur and the location of associated collection and discharge points. The Spill Plan shall include procedures for cleaning up spills including, without limitation, procedures for insuring that appropriate personnel are trained or otherwise notified of measures to take in the event of a spill. The necessary equipment to implement a cleanup shall be listed in the Spill Plan and locations designated such that this equipment shall be available to personnel in all areas where spills may occur.
- The Spill Plan shall provide that all areas in which a spill could potentially discharge to stormwater and where liquid chemicals are stored are provided with impermeable containment which will hold at least the volume of the largest chemical container, or 10% of the total volume of all containers in the area, whichever is larger, without overflow from the containment area. For commercial activities initiated after the date of this general permit, the Spill Plan shall provide that all chemicals in containers of 100 gallons or less shall be stored under a roof that minimizes stormwater entry to the containment area.

- The Spill Plan shall also provide that all dumpsters used to store waste or recyclable materials are supplied with attached covers and have drain plugs intact, or are in roofed areas that will keep rain out of the dumpster and will not allow dumpster leakage to enter any stormwater drainage system.

f. Maintenance and Inspection

The permittee shall prepare and implement a facility maintenance plan. The facility maintenance plan shall include good housekeeping measures to ensure that all areas exposed to stormwater are kept in such a condition as to minimize the possibility of discharging pollutants into a stormwater collection system or waters of the state. The plan shall include provisions for a monthly inspection by a member of the Pollution Prevention Team of all areas covered by the plan, a weekly inspection of the site for surface debris and the monthly inspection of all stormwater structures and outfalls on the site for floating or surface debris and sediment. Structures and outfalls shall be cleaned of sediment and debris at least once a year during the month of April and at other times as necessary to prevent the discharge of pollutants from structures or outfalls.

g. Employee Training

The permittee shall ensure that all employees whose activities may affect stormwater quality receive training upon employment and at least once a year thereafter to make them familiar with these stormwater management measures. Training shall be conducted by a member of the Pollution Prevention Team.

h. Comprehensive Annual Stormwater Evaluation and Inspection

Once a year, a member of the Pollution Prevention Team shall conduct a Comprehensive Annual Stormwater Evaluation and Inspection. All aspects of the stormwater collection and/or treatment system shall be inspected for consistency with the Stormwater Management Plan. A report of the results of this inspection shall be prepared and a copy maintained on site. This report shall also be reviewed and signed by the permittee as specified in Part IV.C.2.c. above. Based on this report, the permittee shall revise the Plan as necessary to maintain consistency with this general permit.

i. Record Keeping

The permittee shall keep at the site a record of all weekly and monthly inspections, the facility spill control and response plan, sweeping schedule, stormwater structure cleaning schedule, employee training schedule, annual stormwater evaluation and inspection reports and a list of designated Pollution Prevention Team members. This record shall be made available to the Commissioner for inspection immediately upon request.

j. Future Construction

The permittee shall ensure that oil and sediment control structures or devices are used within the drainage system for all construction which i) may impact the drainage system and ii) occurs on site on or after the effective date of this general permit. Note that any construction activity that disturbs greater than 5 acres must be registered and conducted in accordance with the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. In addition, the permittee shall avoid, wherever possible, the use of copper or galvanized roofing or building materials for any new construction where these materials will be exposed to stormwater.

3. Keeping Plan Current

The permittee shall update the Plan annually and shall amend the Plan whenever; (1) there is a change at the site which may affect the potential of stormwater discharges from the site to cause pollution of the waters of the state; (2) there is a change in the Pollution Prevention Team; (3) the actions required by the Stormwater Management Measures fail to ensure or adequately protect against pollution of the waters of the state; or (4) the Commissioner requests modification of the Plan. The permittee shall amend the Plan as necessary to address any sources or potential sources of pollution identified as a result of a Comprehensive Annual Stormwater Evaluation and Inspection conducted pursuant to Part V.B.2.h. of this general permit. The amended Plan and all actions required by the Plan shall be completed within 60 days of the date the permittee becomes aware or should have become aware that any condition identified in this paragraph has occurred.

C. Reporting Requirements

1. The permittee shall keep a copy of the Stormwater Management Plan onsite at all times. The permittee shall make a copy of the Plan available to the Commissioner immediately upon request, and, in the case of a stormwater discharge associated with commercial activity that discharges through a municipal separate storm sewer system, to the operator of the municipal system upon request. In the case of a stormwater discharge associated with commercial activity that discharges to a water supply watershed, copies of the Plan shall be made available upon request to the public water supply company.
2. The Commissioner may notify the permittee at any time that the Plan does not meet one or more of the requirements of this Part. Unless otherwise notified by the Commissioner in writing, within 30 days of the date of such notification from the Commissioner, the permittee shall revise the Plan, perform all actions required by the revised Plan, and shall submit to the Commissioner, in writing, certification that the requested changes have been made and implemented and such other information as the Commissioner may require.

D. Other Requirements

1. The stormwater discharge shall contain no distinctly visible floating scum, oil or other matter except naturally occurring substances such as leaves and twigs provided no person has placed such substances in or near the discharge.
2. The stormwater discharge shall not impair the biological integrity of aquatic or marine ecosystems or result in an unacceptable risk to human health.

Part VI. General Conditions

A. *The permittee shall comply with the following Regulations of Connecticut State Agencies which are hereby incorporated into this general permit, as if fully set forth herein:*

1. Section 22a-430-3;
Subsection (b) General - subparagraph (1)(D) and subdivision (2), (3), (4) and (5)
Subsection (c) Inspection and Entry
Subsection (d) Effect of a Permit - subdivisions (1) and (4)
Subsection (e) Duty to Comply
Subsection (f) Proper Operation and Maintenance
Subsection (g) Sludge Disposal
Subsection (h) Duty to Mitigate
Subsection (i) Facility Modifications, Notification - subdivisions (1) and (4)
Subsection (k) Bypass
Subsection (n) Enforcement
Subsection (p) Spill Prevention and Control
Subsection (q) Instrumentation, Alarms, Flow Recorders
Subsection (r) Equalization
2. Section 22a-430-4
Subsection (t) Prohibitions
Subsection (p) Revocation, Denial, Modification
Appendices

B. *The permittee shall comply with the following additional terms and conditions:*

Discharge of any substance that is not from the activities described in this general permit shall be considered a violation of this general permit unless it is authorized by an individual permit issued under Section 22a-430 of the General Statutes.

C. *The permittee shall at all times continue to meet the conditions for eligibility set forth in Part III of this general permit.*

D. *Nothing in this general permit shall relieve the registrant or permittee of other obligations under applicable federal, state and local law.*

- E. Any document, including but not limited to any notice, which is required to be submitted to the Commissioner under this general permit by the permittee shall be signed by the permittee and by the individual or individuals responsible for actually preparing such document, each of who shall certify in writing as follows: "I have personally examined and am familiar with the information submitted in this document and all attachments and certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief, and I understand that any false statement made in this document or its attachments may be punishable as a criminal offense."**

Part VII. Unauthorized Activities

Any person or municipality who fails to submit a registration, and who initiates, creates, originates or maintains a discharge to the waters of the State without coverage under a general permit issued under Section 22a-430b of the Connecticut General Statutes or an individual permit issued under Section 22a-430 of the Connecticut General Statutes, is in violation of the Connecticut General Statutes, and is subject to injunction and penalties of up to \$25,000 per day per violation under Chapter 446k of the Connecticut General Statutes.

Issued Date: September 27, 2000

ARTHUR J. ROCQUE, JR.

Commissioner

This is a true and accurate copy of the general permit executed on August 1, 1995, reissued on September 27, 2000 by the Commissioner of the Department of Environmental Protection.

Appendix A: List Of Standard Industrial Classification (SIC) Code Groups Covered By The General Permit For The Discharge Of Stormwater Associated With Commercial Activity

If you are unsure of which SIC group you may fall under or require a more detailed description of specific SIC codes within these groups, please contact the Stormwater Permit Coordinator for the DEP at 424-3018. Descriptions are as indicated in the Standard Industrial Classification Manual, 1987, Executive Office of the President, Office of Management and Budget.

Group 50: Wholesale Trade - Durable Goods

Group 51: Wholesale Trade - Nondurable Goods

Group 52: Building Materials, Hardware, Garden Supply, and Mobile Home Dealers

Group 53: General Merchandise Stores

Group 54: Food Stores

Group 55: Automotive Dealers and Gasoline Service Stations

Group 56: Apparel and Accessory Stores

Group 57: Home Furniture, Furnishings, and Equipment Stores

Group 58: Eating and Drinking Establishments

Group 59: Miscellaneous Retail

Group 70: Hotels, Rooming Houses, Camps, and Other Lodging Places

Group 71: *Not assigned*

Group 72: Personal Services

Group 73: Business Services

Group 74: *Not assigned*

Group 75: Automotive Repair, Services, and Parking

Group 76: Miscellaneous Repair Services

Group 77: *Not assigned*

Group 78: Motion Pictures

Group 79: Amusement and Recreation Services

Some Possible Questions for Brainstorm - NPDES process/tools/program improvements

Mission: to make incremental improvements on surface water quality through the issuance of clear, defensible, sound, and timely NPDES permits.

1. What prevents us from issuing more permits that meet this mission faster?
2. What steps in the process take the longest time?
3. What are the most important things we do to make our permits defensible upon appeal?
4. What would allow us to issue NPDES permits, authorized GP NOIs, resolve appeals, respond to FOIAs, conduct PQRs more efficiently such as with...
 - a. Tools (existing, modified, new)
 - b. Process or workflow modifications or waste elimination steps
 - c. Standard language
5. What are our current tools, practices, or support that are most helpful to you in issuing permits

Possible Handouts

- Chart showing permits to be issued and other work
- Questions for brainstorm

DH Thoughts:

Purpose: To develop 2-3 action items designed to make the process of issuing NPDES permits better, more efficient

Questions/Brainstorm topics to discuss:

1. What do/can we control? What is out of our control?
2. Can technology help us do our jobs more efficiently?
3. How should we measure progress/success?
4. What are 2-3 obstacles/frustrations permit writers face?
5. Where is value added to the process?
6. What step(s) in the process don't add value?
7. List 2-3 tasks unrelated to developing permit limits that take a substantial amount of your time (responding to FOIA, EJ analysis, assembling administrative record, consultation with other agencies)
8. List 2-3 tasks related to permit writing that may be more easily or more efficiently done by someone else, or done "globally" (for example, determine 7Q10 upfront for all permits we intend to work on).

9. Name 2-3 tasks MassDEP or NH DES staff can assist permit writers with.
10. Name 2-3 tasks or functions that other EPA units can assist permit writers with.
11. Name 2-3 tasks EPA management can do to help permit writers.